

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE DIVISION**

**TAYLOR JONES**

**VERSUS**

**CITY OF BROUSSARD**

\*

\* **CASE NO. 6:22-CV-00565**

\*

\* **CHIEF JUDGE S. MAURICE  
HICKS, JR.**

\*

\* **MAGISTRATE JUDGE CAROL B.  
WHITEHURST**

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**RESPONSE TO REMOVAL ORDER**

Pursuant to the Court's Removal Order of March 2, 2022, Defendant, City of Broussard, through undersigned counsel hereby submits the following information in accordance with 28 U.S.C § 1447(b).

**LIST OF PARTIES AND PLEADINGS**

Defendant, City of Broussard, respectfully submits the following list of parties and pleadings filed in this action and attaches hereto copies of the certified State Court Record as Exhibit A *in globo*.

**A. List of Parties and Counsel:**

1. Plaintiff:	Taylor Jones
Counsel:	Lee C. Durio (Bar No. 37453) Durio Law Firm 241 West Mills Avenue Breaux Bridge, LA 70517
Telephone:	(337) 909-1111
Fax:	(337) 909-1112
Email:	leedurio@duriolaw.com

2. Defendant: City of Broussard

Counsel: E. Fredrick Preis, Jr. (Bar No. 10704)  
Eve B. Masinter (Bar No. 1218)  
Philip J. Giorlando (Bar No. 38234)  
First Bank & Trust Tower, Suite 1500  
909 Poydras Street  
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philip.giorlando@bswllp.com

**B. List of Pleadings and Filings in State Court Record:**

1. Plaintiff's Petition for Damages (10/13/21);
2. *In Forma Pauperis Affidavit* with signed Order (10/18/21);
3. Citation to City of Broussard (10/18/21) with Sheriff's Return dated 10/20/21;
4. Civil Cover Sheet (10/22/21);
5. Defendant's Motion and Order for Extension of Time to File Responsive Pleadings (10/28/21);
6. Defendant's Peremptory Exception of No Cause of Action, Memorandum in Support, Rule to Show Cause on March 2, 2022 (12/6/21);
7. RULE NISI to Taylor Jones, Sheriff's Return to show cause on March 2, 2022 at 10:00 a.m. (12/14/21);
8. Plaintiff's Pretrial Memorandum in Opposition to Exceptions of No Cause of Action (2/22/22);
9. Plaintiff's Amended and Supplemental Petition for Damages (2/25/22);
10. Defendant's Notice of Removal filed in State Court, with attachment (Notice of Removal filed in U.S. District Court for the Western District of Louisiana) (2/25/22).

**CERTIFICATE OF COUNSEL**

I, Eve B. Masinter, hereby certify that the attached certified State Court Record (Exhibit “A”) constitutes the entire record with the 15<sup>th</sup> JDC for the Parish of Lafayette, as confirmed by the certification page signed by Deborah Duplechin, Deputy Clerk of Court for the Parish of Lafayette.

Respectfully submitted:

**BREAZEALE, SACHSE & WILSON, L.L.P.**

By: /s/ Eve B. Masinter  
E. Fredrick Preis, Jr. (La. Bar No. 10704)  
Eve B. Masinter (La. Bar No. 1218), T.A.  
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***Counsel for Defendant, City of Broussard***